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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KIRSTIN BLAISE LOBATO,)	
)	Case No. 2:19-cv-01273-RFB-EJY
Plaintiff,)	
v.)	Judge Richard F. Boulware, II
)	
LAS VEGAS METROPOLITAN)	Magistrate Judge Elayna J. Youchah
POLICE DEPARTMENT, NEVADA,)	
THOMAS THOWSEN, and JAMES)	STIPULATION AND ORDER TO
LAROCHELLE,)	EXTEND DEADLINE TO RESPOND
)	TO DEFENDANTS' MOTION FOR
Defendants.)	SUMMARY JUDGMENT

(First Request)

Pursuant to Local Rule IA 6-1, the parties, by and through their counsel of record, hereby agree and stipulate that the time for Plaintiff to file her response to Defendants' Motion for Summary Judgment (ECF No. 67), which was filed on June

1 28, 2021, should be extended by three weeks—from July 19, 2021, until and
2 including August 9, 2021. The following grounds constitute good cause:

3 1. On June 28, 2021, Defendants filed a 77-page motion for summary
4 judgment. ECF No. 67. Pursuant to Local Rule 7-2(b), Plaintiff's response is due on
5 July 19, 2021.

6 2. Plaintiff's counsel have been occupied with time-sensitive matters in
7 other cases, including a Fifth Circuit brief, a Ninth Circuit brief, and an oral
8 argument related to a motion to dismiss. Plaintiff's counsel also have previously
9 scheduled vacation that will occupy time needed to complete Plaintiff's response
10 brief.

11 3. This stipulation is not brought for any improper purpose, but rather to
12 ensure that both sides to this matter are permitted the benefit of appropriate
13 review of relevant evidence and the time to clearly and adequately lay out the
14 issues for the Court's resolution.

15 4. Plaintiff's counsel have conferred with counsel for Defendants, and the
16 parties have agreed to this extension. Accordingly, Plaintiff and Defendants
17 stipulate that Plaintiff's deadline to respond to Defendants' Motion for Summary
18 Judgment should be extended until August 9, 2021. This stipulation is made in good
19 faith and not for the purpose of delay.

20
21 RESPECTFULLY SUBMITTED,

22
23 /s/ Elizabeth Wang
24 One of Plaintiff's Attorneys

25 /s/ Craig Anderson
26 One of Defendants' Attorneys
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1 **ORDER**

2 IT IS SO ORDERED that the above Stipulation is hereby GRANTED.
3 Plaintiff shall have until August 9, 2021, to file her response to Defendants' Motion
4 for Summary Judgment.

5 DATED this 9th day of July 2021.

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7 _____
8 RICHARD F. BOULWARE, II
9 UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE

I, Elizabeth Wang, an attorney, hereby certify that on July 9, 2021, I filed the foregoing Stipulation and Proposed Order via CM/ECF, which was electronically delivered to all counsel of record.

/s/ Elizabeth Wang
One of Plaintiff's Attorneys